

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

| | | |
|--------------------------------------|---|------------------------|
| REBECCA TERRY, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | No. 17-cv-01112 |
| |) | |
| COUNTY OF MILWAUKEE, <i>et al.</i> , |) | Hon. J.P. Stadtmueller |
| |) | |
| Defendants. |) | JURY TRIAL |
| |) | DEMANDED |
| |) | |

PLAINTIFF'S SUPPLEMENTAL RULE 26(a)(1) DISCLOSURES

Plaintiff Rebecca Terry, through her undersigned attorneys, makes this disclosure pursuant to Federal Rule of Civil Procedure 26(a)(1):

1. Rule 26(a)(1)(A)(1). The following people are likely to have discoverable information which Plaintiff may use to support her claim:
 - a. Karen Gray has knowledge of the duties, documentation, and provision of health care services as an employee of Armor Correctional Health Services at the Milwaukee County Jail. She may be contacted through defense counsel.
 - b. Jennifer Henderson has knowledge of the duties, documentation, and provision of health care services as an employee of Armor Correctional Health Services at the Milwaukee County Jail. She may be contacted through defense counsel.
 - c. De'Angelo McCoy has knowledge of the duties, documentation, and provision of health care services as an employee of Armor Correctional Health Services at the Milwaukee County Jail. He may be contacted through defense counsel.
 - d. Dr. Timothy Allen has information related to Plaintiff's medical treatment through Aurora Sinai Hospital.

- e. CO Armstrong has information related to Plaintiff's custody and/or medical treatment at Milwaukee County Jail. He may be contacted through defense counsel.
- f. Nurse Porlucas has information related to Plaintiff's custody and/or medical treatment at Milwaukee County Jail. He/She may be contacted through defense counsel.
- g. Nurse Roper has information related to Plaintiff's custody and/or medical treatment at Milwaukee County Jail. He may be contacted through defense counsel.
- h. Nurse Goudy has information related to Plaintiff's custody and/or medical treatment at Milwaukee County Jail. He/She may be contacted through defense counsel.
- i. Health Unit Coordinator Linda has information related to Plaintiff's custody and/or medical treatment at Milwaukee County Jail. She may be contacted through defense counsel.
- j. Charge Nurse Abunaj has information related to Plaintiff's custody and/or medical treatment at Milwaukee County Jail. He/She may be contacted through defense counsel.
- k. Supervisor Walker has information related to Plaintiff's custody and/or medical treatment at Milwaukee County Jail. He/She may be contacted through defense counsel.
- l. Supervisor Fred has information related to Plaintiff's custody and/or medical treatment at Milwaukee County Jail. He/She may be contacted through defense counsel.
- m. Nurse Robertson has information related to Plaintiff's custody and/or medical treatment at Milwaukee County Jail. He/She may be contacted through defense counsel.
- n. Nurse, Name Currently Unknown, Listed as "LPN Infirmary for 03/10" at ARMOR 50 (Name Illegible) may have information related to Plaintiff's custody and/or medical treatment at Milwaukee County Jail.

He/She may be contacted through defense counsel.

- o. Booking Nurse #1 (not Exum), Name Currently Unknown, Listed as “LPN Infirmary” at ARMOR50 (Name Illegible) may have information related to Plaintiff’s custody and/or medical treatment at Milwaukee County Jail. He/She may be contacted through defense counsel.
- p. Booking Nurse #2, Name Currently Unknown, at ARMOR50 (Name Illegible) may have information related to Plaintiff’s custody and/or medical treatment at Milwaukee County Jail. He/She may be contacted through defense counsel.
- q. Medical Assistant Sanchez may have information related to Plaintiff’s custody and/or medical treatment at Milwaukee County Jail. He/She may be contacted through defense counsel.
- r. DON Gina Strehlow may have information related to Plaintiff’s custody and/or medical treatment at Milwaukee County Jail. She may be contacted through defense counsel.
- s. HUS Administrator Rusty Perry has information related to Plaintiff’s custody and/or medical treatment at Milwaukee County Jail. He may be contacted through defense counsel.
- t. CO Cannon has information related to Plaintiff’s custody and/or medical treatment at Milwaukee County Jail. He/She may be contacted through defense counsel.
- u. Ronald Shansky has information related to Plaintiff’s *Monell* claims.
- v. Richard Schmidt has information related to Plaintiff’s claims, including her *Monell* claims. He may be contacted through defense counsel.
- w. Melinda Andrzewski may have knowledge related to Plaintiff’s custody and/or medical treatment at Milwaukee County Jail. She may be contacted through defense counsel.
- x. Mirian Boyd-Organ may have information related to Plaintiff’s custody and/or medical treatment in Milwaukee County Jail . She may be

contacted through defense counsel.

- y. Gina Buono has information related to Plaintiff's custody and/or medical treatment at Milwaukee County Jail. She may be contacted through defense counsel.
- z. Pamela Prince has information related to Plaintiff's custody and/or medical treatment at Milwaukee County Jail. . She may be contacted through defense counsel.
- aa. Heidi A Lundeen has knowledge of Plaintiff's time in the Milwaukee County Jail after her delivery on or about March 10, 2014. She may be contacted through defense counsel.
- bb. Thomas Gable has knowledge of Plaintiff's time in the Milwaukee County Jail after her delivery on or about March 10, 2014. He may be contacted through defense counsel.
- cc. Margie Burton has knowledge of Plaintiff's time in the Milwaukee County Jail after her delivery on or about March 10, 2014. She may be contacted through defense counsel.
- dd. Crystalina Motano may have information related to Plaintiff's custody and/or medical treatment at Milwaukee County Jail. She may be contacted through defense counsel.
- ee. Dashyla Elliot may have information related to Plaintiff's custody and/or medical treatment at Milwaukee County Jail. She may be contacted through defense counsel.
- ff. Julie Shanahan may have information related to Plaintiff's custody and/or medical treatment at Milwaukee County Jail. She may be contacted through defense counsel.
- gg. Anthony Cronk may have information related to Plaintiff's custody and/or medical treatment at Milwaukee County Jail. He may be contacted through defense counsel.
- hh. Amika Avery may have information related to Plaintiff's custody and/or medical treatment at Milwaukee County Jail. She may be

contacted through defense counsel.

ii. CO J. Smith may have information related to Plaintiff's custody and/or medical treatment at Milwaukee County Jail. He/She may be contacted through defense counsel.

jj. CO G. Poetz may have information related to Plaintiff's custody and/or medical treatment at Milwaukee County Jail. He/She may be contacted through defense counsel.

kk. Milwaukee County Jail Records Custodian has knowledge of the recordkeeping practices of Milwaukee County Jail. He/She may be contacted through defense counsel.

This disclosure is not intended to be a final list of possible witnesses in this case and Plaintiff hereby reserves the right to supplement this disclosure in the event further investigation reveals other individuals with knowledge. Plaintiff furthermore expressly incorporates herein all of the individuals with knowledge disclosed by the Defendants in this action.

March 15, 2018

Respectfully submitted,

/s/ Aisha N. Davis

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CERTIFICATE OF SERVICE

I, Aisha N. Davis, an attorney, certify that on March 15, 2018, I served the foregoing Plaintiff's Supplemental Rule 26(a)(1) Disclosures via electronic mail to all counsel of record.

/s/ Aisha N. Davis
One of Plaintiff's Attorneys